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September 9, 2005

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station, 2<sup>nd</sup> Floor  
Boston, MA 02110

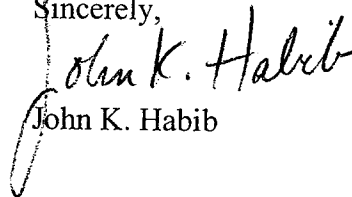
Re: Investigation by the Department of Telecommunications and Energy on its Own Motion to Increase the Participation Rate for Discounted Electric, Gas and Telephone Service, Pursuant to G.L. c. 159, § 105 and G.L. c. 164, § 76, D.T.E. 01-106/D.T.E. 05-55

Dear Ms. Cottrell:

Please find attached the responses of Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company, d/b/a NSTAR Electric, and NSTAR Gas Company (with NSTAR Electric, the "Companies"), to the First Set of Information Requests issued by the Department of Telecommunications and Energy (the "Department"), as listed on the following page. The Companies will endeavor to submit responses to the remainder of the Department's Information Requests on Monday, September 12.

Thank you for your attention to this matter. Please contact me or David Rosenzweig if you have any questions.

Sincerely,

  
John K. Habib

Enclosures

cc: Jeanne Voveris, Hearing Officer  
Elizabeth Cellucci, Hearing Officer  
Service List, D.T.E. 01-106

**INFORMATION REQUEST RESPONSES ATTACHED**

DTE-1-4

DTE-1-5

DTE-1-6

DTE-1-7

Information Request DTE-1-4

Please provide a detailed explanation of the company's existing traditional outreach methods (i.e., not including the computer matching program) to ensure that the low-income discount rate is available to eligible customers. How often is each method of outreach conducted? What is the protocol for signing up new customers for the low-income discount rate under these traditional outreach methods? What is the protocol for removing customers from the low-income rate under traditional outreach methods?

Response

- **Outreach Efforts**

NSTAR's outreach efforts to enroll eligible customers in its low-income rates are designed to be proactive and are wide-reaching in scope. In addition to direct coordination with government agencies, the Company utilizes its call center to accomplish outreach and enrollment efforts. If a customer calls NSTAR regarding eligibility for low-income rates, the Company's customer-care employees initiate eligibility verification during that call. NSTAR also trains its staff to educate customers about different rates and energy-efficiency programs whenever customers call with questions about their bills. If a customer applying for electricity or gas service states that he or she receives benefits administered by the Low Income Home Energy Assistance Program ("LIHEAP") or the Massachusetts Department of Transitional Assistance ("DTA"), including Supplemental Security Income, NSTAR will initiate their enrollment in its low-income rates based on that phone call.

In addition to outreach performed through NSTAR's call center, the Company continually notifies all of its customers of the availability of low-income rates through several means, including: (1) advertising campaigns; (2) brochures and bill inserts; and (3) cooperation with public agencies and community organizations throughout its service territory. These efforts are described more fully below.

⇒ Advertising

During 2005, NSTAR will expend approximately \$60,000 in direct media advertising to promote awareness of its low-income rates. The media campaign targets communities where the largest populations of eligible customers reside. In

addition, the print advertisement was placed in Portuguese and Spanish. The Company has also incorporated references to its low-income rates into its overall corporate print-ad materials.

⇒ Customer Mailings, Brochures and Inserts

NSTAR performs direct outreach to its customers regarding the availability of low-income rates through periodic customer mailings, brochures and bill inserts. For example, in September through November each year, every NSTAR customer receives a bill insert regarding the availability NSTAR's low-income rates. In addition, each of NSTAR's customers received a separate bill insert in February, explaining all of the Company's available rates, including a toll-free number to obtain further information about the Company's low-income rates. In total, four bill inserts are sent to customers annually that reference the availability of the Company's low-income rates, including one in December that includes a Financial Hardship enrollment form, which is distributed to customers annually. Moreover, messages about the Company's low-income rates are presented to customers either on their bill or by mention in the Company's customer newsletter.

⇒ Outreach Through Community Leaders

In addition to outreach provided through the DTA and 10 fuel assistance agencies, NSTAR outreached to more than 100 town offices throughout its service territory during 2005 to discuss the availability of its low-income rates and to provide brochures with further information about the low-income rates. NSTAR also has maintained a long-standing tradition of outreaching to community leaders in various organizations to discuss qualifications for the Company's low-income rates. These organizations include, but are not limited to:

- the Urban League;
- the South Boston Neighborhood House;
- fire and police departments;
- health and human services organizations;
- food banks;
- Roxbury District Court;
- Cambridge City Hospital;

- public housing organizations;
- veteran's agencies;
- Salvation Army offices;
- libraries; and
- the Massachusetts Department of Revenue.

Although the vast majority of NSTAR's customers enrolled in the low-income rates are subscribed through the Company's coordination with the DTA and LIHEAP agencies, the Company has been able to reach additional customers eligible for NSTAR's low-income rates through its community outreach efforts. These efforts have proven to be effective because the Company has reached customers through these community-based organizations that are eligible for its low-income rates that may otherwise not have responded to the Company's outreach through social service agencies. Accordingly, NSTAR will continue to work to enroll customers in its low-income rates through cooperation with a broad scope of public agencies and organizations in an effort to reach the maximum number of eligible customers.

- **Enrollment Protocols**

NSTAR's procedures for enrolling eligible subscribers are based on G.L. c. 164, § 1F(4)(i), as added by the Electric Restructuring Act of 1997 (the "Act").<sup>1</sup> Pursuant to G.L. c. 164, § 1F(4)(i), eligibility for low-income utility rates is established based on verification of a customer's receipt of a means-tested public benefit or eligibility for fuel assistance through LIHEAP. In either case, a customer's total household income cannot exceed 175 percent of the federal poverty level. G.L. c. 164, § 1F(4)(i). According to these criteria, NSTAR has identified several means-tested public benefit programs under which both gas and electric customers may be eligible for the Company's low-income rates:

- Transitional Aid to Families with Dependent Children ("TAFDC") (administered by the DTA);

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<sup>1</sup> Although the Act's provisions regarding low-income rates do not apply specifically to gas customers, the Department, in its initiative into unbundling gas service in Massachusetts, has applied the same standard for low-income discount rates for gas distribution companies. See 220 C.M.R. 14.03(b). Thus, NSTAR Gas has also incorporated the provisions in 220 C.M.R. 14.03 and G.L. c. 164, § 1F(4)(i) in its rates and offers low-income rates to its customers under the same terms as those offered to NSTAR Electric's customers.

- Supplemental Social Security Income ("SSI") (administered by the DTA);
- Emergency Aid to Elderly, Disabled and Children ("EAEDC") (administered by the DTA);
- Food Stamps (administered by the DTA);
- Mass Health (or "Medicaid") (administered by the Division of Medical Assistance);
- LIHEAP (administered by the Massachusetts Department of Housing and Community Development and various local Community Action Programs);
- Refugee Resettlement Benefits (administered by the DTA);
- Head Start (administered by local school systems);
- National School Lunch or Breakfast Program (administered by local school systems);
- Women, Infants, and Children Program ("WIC")
- Massachusetts Veterans Benefits;
- Recipients of Improved Veterans Disability Pensions; and
- Recipients of Indemnity Compensation for Surviving Parents of Veterans (with the above two, "Veterans Benefits," each administered by federal and state veterans agencies).

Rather than verifying a customer's household income to determine eligibility for low-income rates, NSTAR generally presumes eligibility based on the customer's receipt of a means-tested public benefit (such as those listed above), or establishes eligibility based on information that is provided to the Company by the agencies administering those benefits. Because the government-assistance agencies verify household income as part of the assistance program, and because NSTAR does not generally collect or maintain customer income information, this process

serves as an efficient means of verifying a customer's eligibility for participation in the Company's low-income rate program.

Thus, when a customer applies for service through NSTAR's call center, NSTAR representatives will inquire whether anyone in the customer's home receives government benefits from: SSI, Refugee Assistance, TAFDC, EAEDC, Food Stamps, Medicaid, Veteran's Benefits or Fuel Assistance. If the answer is affirmative, the Company codes the customer's account pending verification of the customer's receipt of such benefits. In order to verify the customer's receipt of means-tested benefits, NSTAR will either: (1) match the customer's name with the names of customers eligible for LIHEAP through lists provided by LIHEAP agencies; (2) send the DTA a list of new NSTAR customers with a request that the DTA confirm such customers are clients of DTA and receive public benefits;<sup>2</sup> or (3) request that the customer send the Company proof of the customer's participation in a means-tested program (e.g., for Veteran's Benefits). Eligibility for the Company's low-income rate must be verified on an annual basis to continue receiving service at the discounted rate.

With regard to referrals from LIHEAP agencies, NSTAR periodically sends those agencies a list of all customers who participated in the Company's low-income rates for the prior year, as well as customers that indicate they receive fuel assistance. This list is used to match customer names with LIHEAP records and either initially enroll in the discount rate program, or renew the customer's eligibility for the program. Once the LIHEAP agencies have begun to enroll clients in their programs, the agencies send the names of those clients whose household incomes are at or below 175 percent of the federal poverty level to NSTAR so that NSTAR can automatically enroll or re-enroll customers in its low-income rates. In this manner, all customers eligible for LIHEAP assistance in a given heating season are automatically enrolled in NSTAR's low-income rates for that year. As noted above, for NSTAR customers who have claimed eligibility based on participation in a DTA-administered program, NSTAR sends the DTA information regarding the new or re-enrolling customer and the agency verifies

<sup>2</sup>

NSTAR's ability to access information electronically from the DTA regarding existing DTA clients has traditionally been limited to situations where a customer of NSTAR has requested enrollment on NSTAR's low-income rates and has notified NSTAR of his or her enrollment in a DTA-administered benefit program. Accordingly, when NSTAR asks the DTA for information verifying that customer's enrollment in a DTA-administered program, the DTA shares information with NSTAR under a presumption that the customer has affirmatively authorized NSTAR to verify enrollment. NSTAR also accepts a copy of such customer's DTA identification card or benefit confirmation letter to confirm their eligibility for a low-income rate.

that the customer receives DTA-administered benefits before the Company enrolls or re-enrolls that customer in its low-income rates.

For privacy reasons, however, a different enrollment process is used for persons who are new DTA clients and have not claimed eligibility in NSTAR's low-income rate program. If an NSTAR customer becomes a new DTA client by virtue of the customer's receipt of TAFDC, EAEDC, Food Stamps, MassHealth or SSI benefits, the DTA will notify a designated, independent mailing firm retained by NSTAR and the mailing firm will send the new DTA client information and an application for participation in NSTAR's low-income rates. When the customer returns the Company's application form to NSTAR, NSTAR will process the application. These enrollment procedures with the LIHEAP agencies and the DTA allow NSTAR to renew<sup>3</sup> automatically its low-income rates for more than 96 percent of its customers who have previously received service on the Company's low-income rates.

In addition to these enrollment procedures involving LIHEAP and DTA clients, the Company will enroll customers if the Company receives proof directly from the customer, or an organization working with the customer, that the customer is eligible for a means-tested program. For example, NSTAR also recently targeted 150 schools across its service territory and developed an authorization form where schools can verify eligibility for the Company's low-income rates based on a family's participation in a school lunch program. The Company has also targeted Head Start programs by developing an authorization form that allows the administrators of such programs to verify eligibility automatically. In addition, NSTAR has an agreement with Women, Infants and Children ("WIC") under which administrators for the program would verify their clients' income eligibility for the Company's low-income rates.

<sup>3</sup>

The Company re-enrolls customers annually in its low-income rates either automatically, after confirmation of a customer's continued eligibility for the same means-tested public program under which such customer was originally enrolled in the Company's low-income rates, or via correspondence between the customer and the Company in cases where the Company has determined that the customer is no longer eligible for the means-tested program under which the customer was originally enrolled. Regarding the latter, the Company will send a letter to the customer noting that re-enrollment is possible after the Company verifies the customer's eligibility for a new means-tested program.



- **Recertification/Removal Protocol**

With regard to customers eligible for the Company's discount rate through their receipt of Fuel Assistance, these customers remain on the Company's discount rate until March 1 of the following fuel year, at which time customer would get a letter, informing them that they may no longer qualify for the rate. If the Company cannot confirm a customer's eligibility by May 1, the customer will be placed on the Company's non-discounted residential rate. If confirmation of eligibility is confirmed, the customer is left on the discount rate for another year.

With regard to DTA and DMA clients, all data is submitted to the agency and received from the agency electronically. A file is generated by the Company monthly that includes new customers for which the Company is seeking verification of their eligibility for the Company's discount rate and existing customers who require recertification (after taking service from the Company via a discount rate for the previous 12 months). The file is submitted to the relevant agency for verification. The agency sends a file back to the Company indicating whether the customer is receiving a benefit through an income-eligible program. Recently, however, the Company was informed by EOHHS that EOHHS intends to discontinue verifying NSTAR customers' eligibility for EOHHS's programs through this process.

With regard to other programs, such as school lunch, WIC and public housing, customers that participate in these programs must recertify with the Company each year. A letter is sent to these customers at least 30 days before eligibility expires. NSTAR works with the schools directly to get the forms signed and returned to the Company. The Company also works directly with various public housing projects and WIC offices to ensure that customers get the correct paper work signed and returned.

Information Request DTE-1-5

Please provide a detailed explanation of how customers are recertified as eligible for the low-income discount rate each year under the traditional outreach process. How often does the recertification process occur? Are customers removed from the low-income discount rate until the customer confirms that he/she continues to be eligible for the low-income discount rate? If so, how are these customer tracked?

Response

Please see the Company's response to Information Request DTE-1-4 regarding "Recertification/Removal Protocols".

Information Request DTE-1-6

Are customers that are located via traditional outreach methods enrolled on the low-income discount rate as of the date that they apply for the rate or as of the date that the application is confirmed or approved?

Response

Customers are enrolled as of the date that their eligibility is confirmed.

NSTAR Electric  
Department of Telecommunications and Energy  
D.T.E. 01-106B/05-55  
Information Request: **DTE-1-7**  
September 9, 2005  
Person Responsible: Margaret Coughlan  
Page 1 of 1

Information Request DTE-1-7

Please provide copies of each report submitted to the Commonwealth of Massachusetts Division of Energy Resources, pursuant to G.L. c. 164, §1F(4)(I), since March 1, 1998, regarding the company's "outreach activities and results."

Response

Please see Attachments DTE-1-7(a) through (g) for the requested information.



800 Boylston Street  
Boston, Massachusetts 02199

**Attachment  
DTE-1-7 (a)**

**The NSTAR Companies**  
Boston Edison  
ComElectric  
ComGas  
Cambridge Electric

December 31, 1999

Ms. Karin M. Pisiewski  
Consumer Educator  
Commonwealth of Massachusetts  
Office of Consumer Affairs  
Division of Energy Resources  
100 Cambridge Street, Room 1500  
Boston, MA 02202

**Re: Low Income Discount Electric Rates**

Dear Ms. Pisiewski:

Boston Edison Company is pleased to provide the following information about the results of our outreach activities through December 1999.

**Outreach Activities:**

1. Provide information to the department of Revenue to facilitate reaching the working poor and those assisted by the Child Support Division.

*Boston Edison is willing to work with Department of Revenue, however, there are privacy issues that make this form of communication sensitive.*

2. Use Phrase "Discount Rate" as practicable when referring to the low-income discount.

*Boston Edison Company has used the term "Discount Rate" on all promotional material for Rate R-2.*

3. Revise the Financial Hardship form so that it clearly notifies the customer of the expanded availability of a discount rate.

*The "Important Message" information that is left by collectors during field visits has been revised, and now includes a prominent message about Boston Edison's R-2 discount rate. Our dedicated insert about financial hardship protections, as well as our annual fuel assistance bill insert contained a message about the discount rate. Both these inserts were mailed in the fall.*

4. On a quarterly basis, include discount rate information in conjunction with existing bill inserts or bill messages. Annually, include a bill insert with residential customer bills explaining expanded guidelines, with a message appearing on the outside of the bill envelope calling attention to this insert. The



800 Boylston Street  
Boston, Massachusetts 02199

**The NSTAR Companies**

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Ms. Karin M. Pisiewski

12/31/99

message will be consistent with spacing and printing capabilities and be similar to such wording: "enclosed information may entitle you to a discounted electricity rate."

*The discount rate was advertised in Boston Edison's spring (April), June and September editions of "Illuminations". A special insert was included with all residential bills in March, and the outside envelope had the message: "Discount Rate Information Enclosed" printed in red ink.*

5. Set up point-of-purchase displays at appropriate governmental agencies' walk-in service areas, and Boston Edison Customer Service Centers in Boston, Dorchester and Chelsea.

*Approximately 35,000 pamphlets have been distributed to over 200 agencies in our service territory. Displays and pamphlets have been placed at our three customer service centers.*

6. Inform schools and relevant children's camps of the expanded availability of the discounted rate in an effort to reach the child's parent or guardian.

*Some inner city schools have received the information, i.e., The John D O'Bryant School, Dorchester Youth Collaborative, and SMILE (a headstart program) which is a combined school and day care. We have also visited many YMCA's in our territory.*

7. Conduct an advertising campaign in community newspapers, including non-English speaking newspapers.

*Print ads for Boston Edison's discount rate appeared in 16 community newspapers from March 15 to May 4 totaling over 40 placements. The media buy for the campaign targeted communities where the largest populations of eligible customers reside. The media buy included placement in a Spanish, Chinese and Russian newspaper in addition to a publication aimed at senior citizens.*

8. Provide the customer with a new toll-free utility phone number to call with all public outreach efforts.

*A dedicated 1-800 number was established for use in our brochures.*

9. Boston Edison will present eligibility guideline information to established community contacts.

*Our brochures include all eligibility information and were distributed to community contacts throughout our territory. This outreach was a team effort by our Community Relations Representatives and our Customer Service Representatives. The contact number of our Customer Service Representative in Regulatory Relations at Boston Edison was left at each display in case there are questions or supply of brochures is depleted. We plan to re-visit each site periodically to restock brochures and participate in meetings, etc., as much as possible.*



800 Boylston Street  
Boston, Massachusetts 02199

**The NSTAR Companies**

Boston Edison  
ComElectric  
ComGas  
Cambridge Electric

Ms. Karin M. Pisiewski

12/31/99

10. Eligibility guidelines will appear on Boston Edison's Web Site, [www.nstaronline.com](http://www.nstaronline.com)

*Our website now includes eligibility guidelines.*

11. As part of our Energy Audit program, approximately 1400 discount rate brochures were distributed to residential customers.

With the exception of bill inserts, most outreach activity has been done by personal visits. Our representatives have participated in group meetings with low income, community and elderly groups. We distributed the brochures at such events as "Senior Citizen's Day" at Boston City Hall, and have alerted employees to offer the discount rate to customers who call for other reasons, and may be eligible. The new brochure does not look like a brochure designed specifically for a low-income customer, and hopefully encourages all customers to read it to see if they may be eligible.

Using January, 1999 as a starting point, the number of Boston Edison Customers on the discount rate has increased by 3%, from approximately 29,800 to approximately 30,700.

The personnel resources dedicated to this campaign kick-off have been significant. During March, April and May, two customer service representatives as well as our community relations representatives, dedicated approximately one full day per week to this campaign. Our billing representatives worked overtime from the March mailing through September in order to get the verifications completed and notify customers who may not be eligible. Our Communications Specialist worked with an outside agency to design a brochure, point of purchase displays, and special envelopes – as well as oversee the quarterly advertising of the rate in other publications. A translation to Spanish was made available to representatives in Community Centers who expressed an interest. We may print a brochure in Spanish next time.

Thank you for the opportunity to provide the above information. I have also enclosed a copy of our outreach materials. If you have any questions, please do not hesitate to contact me.

Very truly yours,

Margaret A. Coughlan  
Manager

Regulatory Relations

Telephone: (617) 424-3738

E-Mail: [margaret\\_coughlan@nstaronline.com](mailto:margaret_coughlan@nstaronline.com)

December 31, 1999

Ms. Karin M. Pisiewski  
Consumer Educator  
Commonwealth of Massachusetts  
Office of Consumer Affairs  
Division of Energy Resources  
100 Cambridge Street, Room 1500  
Boston, MA 02202

Re: Low Income Discount Electric Rates

Dear Ms. Pisiewski:

Cambridge Electric Light Company and Commonwealth Electric Light Company (together "COM/Electric" or the "Companies") are pleased to submit the results of their outreach activities for the Companies' low-income discount rates. This report is submitted in accordance with the Division of Energy Resources' letter dated December 9, 1999.

COM/Electric's outreach activities substantially conform to the guidelines recommended by the DOER. If you have any questions about the Companies' activities in this area, please call me at (617) 424-3588.

Sincerely,

Lauren Foley  
Director, Call Center

LAF/ame

Enclosure

cc: Claudine Langlois, Director, Consumer Division  
Department of Telecommunications and Energy



## ANNUAL REPORT OF OUTREACH ACTIVITIES REGARDING LOW-INCOME DISCOUNT RATES

Commonwealth Electric Company and Cambridge Electric Light Company (together "COM/Electric" or the "Companies") currently enroll customers on the discounted, residential assistance rates, R-2 and R-4, provided the customer's household income does not exceed 175 percent of the federal poverty level. In the last three years, the Companies' enrollment in the discount rate program has been:

<u>Year</u>	<u>Number of Customers</u>	<u>Value of Discount Subsidy</u>
1997	15,955	\$2.9 million
1998	16,563	\$2.4 million
1999	17,242	\$2.4 million

In 1999, more than 17,000 customers, or 5.9 percent of the residential customer base, received this discount. Although the number of customers enrolled in this rate has increased, the subsidy value has decreased due to lower retail rates required by the electric industry restructuring act, and slightly lower electric usage among these customers.

The Companies have a very successful electronic file matching program with state welfare and fuel assistance agencies that allows them to maintain high enrollment and recertification levels. COM/Electric uses the following agencies and programs to enroll or recertify customer eligibility for this benefit.

Department of Transitional Assistance ("DTA") – The DTA qualifies customers who receive any of the following benefits: Transitional Aid to Families with Dependent Children; Emergency Aid to Elderly, Disabled and Children; Food Stamps; Veteran's Benefits; Refugee Assistance; Emergency Assistance; and Supplemental Security Income ("SSI"). These programs all have eligibility thresholds below 175 percent of the federal poverty level.

Low Income Home Energy Assistance Program ("LIHEAP") agencies. COM/Electric uses four LIHEAP agencies to screen and enroll customers for the discount rate. These are: the South Shore Community Action Council (a Low-Income Energy Assistance Program ("LIHEAP") agency serving Plymouth and Cape Cod areas), People Acting in Community Endeavors (a LIHEAP agency serving greater New Bedford), Citizens for Citizens (a LIHEAP agency serving Fall River and Westport), Cambridge-Somerville Fuel Assistance (a LIHEAP agency serving Cambridge). These programs all have eligibility thresholds below 175 percent of the federal poverty level.

Salvation Army – COM/Electric also allows customers to apply for the discount through the Salvation Army. This agency verifies that total household income does not exceed 175 percent of the federal poverty level. It reaches customers who may not qualify for, or did not apply for, the programs administered by DTA or LIHEAP. COM/Electric currently has 1,218 customers who receive the discount based on this certification.

COM/Electric performs electronic file matching with these agencies to identify eligible customers, and recertify eligibility. We performed this type of file matching since 1993. Our recertification is rolling, and a customer receives the discount for twelve months following the latest eligibility match from any of these agencies. COM/Electric matches files with the LIHEAP agencies twice per month during the winter, and performs monthly matches with DTA. Annually, COM/Electric matches their customer database with the agencies data to recertify customer eligibility for the discount. Our database matches the customer's name, address, social security number, and the type of benefit (e.g., Fuel Assistance, Food Stamps, Temporary Aid to Families with Dependent Children, etc.) the customer receives.

In 1999, our enrollments and recertifications came from the following sources:

Fuel Assistance agencies –	10,387 customers or 60.2 percent
Department of Transitional Assistance -	5,637 customers or 32.7 percent
Salvation Army -	1,218 customers or 7.1 percent

## Eligibility Verification Methods

The Companies offer the following discussion of its discount rate verification process. COM/Electric uses a comprehensive automated matching program to enroll or recertify residential discounted rate customers. In addition, COM/Electric has exchanged data files with fuel assistance agencies and the Department of Transitional Assistance since 1993. Specifically, when a customer applies for service, COM/Electric asks if anyone in the customer's home receives benefits from any of the following programs:

- Transitional Aid to Families with Dependent Children
- Emergency Aid to Elderly, Disabled and Children
- Food Stamps
- Mass Health Basic and Standard
- National School Lunch Program
- School Breakfast Program
- Low Income Energy Assistance
- Mass Veteran's Benefits
- Dependency and Indemnity Compensation for Surviving Parents of Veterans
- Improved Disability of Pension for veterans or widower of veterans.
- Head Start
- Supplemental Social Security Income
- Senior Pharmacy Program

If the customer answers affirmatively, COM/Electric codes the customer's account to match with files from these agencies. If we cannot match files with an agency, we ask the customer to send us a copy of their eligibility card or letter.

All new DTA clients receive a letter from an independent mailing house describing the procedure to apply for the discounted rate. When a customer returns an authorization form to COM/Electric, COM/Electric determines the customer's eligibility and places the customer on the discounted rate. If it is easier for the customer, COM/Electric also accepts a copy of the customer's identification card or benefit confirmation letter from the certifying agency to confirm eligibility and change the customer's rate. If the customer applied for fuel assistance, COM/Electric submits a data file to the appropriate fuel assistance agency for confirmation.

If a customer does not receive any of these benefits, COM/Electric asks the customer if he or she wants information on benefits for low-income households. If appropriate, COM/Electric sends to that customer referral and application information for the Salvation Army's screening program. The Salvation Army conducts income screening for COM/Electric and sends COM/Electric a list of all customer with household incomes below 175 percent of the federal poverty level. We use that list to enroll customers on our discount rate.

We also inform customers about the discount rate, and other assistance benefits such as fuel assistance and cooling assistance, through bill stuffers, and customer calls.

Once COM/Electric receives eligibility confirmation, COM/Electric assigns the discounted rate to the account of the eligible customer. This rate is valid for one year from the confirmation date. If the customer moves from an address where he or she already received the discount rate, COM/Electric does not require recertification. Also, COM/Electric routinely sends recertifying tapes several times over the year to all of the agencies with which the Companies work. Our customers can be requalified several times a year, and the renewal extends their eligibility for a year from the latest requalification. If a customer does not qualify for the discounted rate, COM/Electric notifies them in writing and describes other means to apply for the discounted rate or appeal COM/Electric's decision.

## DOER Guidelines

The following is a description of how the Companies have addressed the DOER's recommended outreach activities. Additional efforts the Companies made are addressed at the end of this section.

1. **Provide information to the Department of Revenue to facilitate reaching the working poor and those assisted by the Child Support Division.**

The Companies will provide copies of our rate summaries and the Important Information for Residential Customers brochures to the Department of Revenue and the Child Support Division for distribution to their customers. This material includes information about the discount and other important consumer protections. We are willing to work with these agencies on more specific measures, provided they have the resources and ability to do so, and can resolve the privacy issues that make this form of communication sensitive.

2. **Use the phrase "Discount Rate" when referring to the low-income discount.**

The Companies used this term in all promotional materials for the rate.

3. **Revise the Financial Hardship form so that it clearly notifies the customer of the expanded availability of a discount rate.**

The Companies revised their "Important Information for Residential Customers" pamphlet to include information about the discount rate. This pamphlet was mailed to all customers in November 1999.

4. **On a quarterly basis, include discount rate information in conjunction with existing bill inserts or bill messages. Annually, include a bill insert for residential customers explaining expanded guidelines, with a message appearing on the outside of the bill envelope calling attention to this insert. The message will be consistent with spacing and printing capabilities and be similar to such wording: "enclosed information may entitle you to a discounted electricity rate."**

The Companies promoted the discount rate through customer bills six times in 1999. In February, we mailed each customer a summary of all of our rates, including the discount rate. In March, we put a special message on all bills reminding customers to apply for fuel assistance and to apply for the discount rate. We published reminders about the discount rate in the April, June, and October issues of our customer newsletter "Comment". Finally, we included a reminder about the discount rate in our "Important Information" pamphlet mailed to all customers in November. Information about the discount rate is also available on our web site, at [WWW.NSTARONLINE.COM](http://WWW.NSTARONLINE.COM).

5. **Set up point of purchase displays at appropriate government agencies walk-in service areas and customer service centers.**

The Companies provided literature about the rate to community anti-poverty agencies serving our customers, and in our New Bedford, Yarmouth, Plymouth and Martha's Vineyard customer service offices.

6. **Inform schools and relevant children's camps of the expanded availability of the discounted rate in an effort to reach the child's parent or guardian.**

We discussed the difficulty of using camps in our territory with Mr. DeVito last May, as many of the camps on Cape Cod are seasonal and target vacationers. We proposed using expanded site visits at public housing and low-income housing complexes as an alternative, which he approved. We will distribute brochures about the discount rate to YMCA camps, which have a greater population of local residents.

7. **Provide the customer with a toll-free utility phone number to call with all public outreach efforts.**

The Companies included their toll-free customer service numbers in all promotional materials for the discount rate.

#### **Other Outreach Activities Performed**

The Companies gave their customer service employees a copy of the DOER's list of all means tested public benefit programs. The staff uses this information to determine if customers could qualify for the discount rate.

In May, COM/Electric discussed the DOER's guideline regarding using camps for an outreach program with Vincent DeVito. We felt an outreach program with camps in our service territory would not be effective, because most of the camps on Cape Cod serve seasonal visitors, not year-round residents, and proposed an outreach program with other low income agencies instead. This alternate was approved. This summer, we gave a presentation about the discount rate and took recertification applications at three low income and senior housing centers. This was in lieu of the DOER's enrollment through camps recommendation.

The Companies promoted the discount rates through meetings with elderly and low-income housing residents, local consumer advocates, food pantries and social service agencies. Company employees met with representatives from the following agencies and provided brochures and information about COM/Electric's discount rates to give to their clients:

1. The Society of Saint Vincent DePaul
2. The United Way
3. New Bedford Coastline Elderly Services
4. Cape Cod Times Needy Fund
5. Lower Cape Outreach Council
6. South Shore Community Action Council
7. Cambridge Housing Authority
8. The Hispanic Multi-Service Center operated by PACE in New Bedford
9. Local councils on aging

We also placed information about the rate and other consumer protections in the customer service area at our offices in New Bedford, Plymouth, Yarmouth, and Martha's Vineyard and published discount rate and fuel assistance information on our web site.



800 Boylston Street Boston, Massachusetts 02199

Attachment  
DTE-1-7 (c)

December 29, 2000

Ms. Karen Pisiewski, Public Information Officer  
Commonwealth of Massachusetts  
Office of Consumer Affairs  
Division of Energy Resources  
100 Cambridge Street, Room 1500  
Boston, MA 02202

**RE: Low Income Discount Electric Rates**

Dear Ms. Pisiewski:

NSTAR Electric is pleased to provide the following information about the results of our outreach activities through December 2000.

NSTAR Electric performed comprehensive outreach efforts for our discounted, residential-assistance rates. Our efforts consisted of:

- Advertising and mass media campaigns
- Customer mailings, brochures and bill inserts
- Education and assistance through our call centers
- Automatic enrollment and renewals through various government agencies, and
- Outreach through public offices in our service area

Specific details of these programs are described below. Overall, we are proud of our efforts to reach the needy in our community. In 1999, NSTAR Electric had 47,033 customers enrolled on our discount rate. As of November 30, 2000 we now have 47,844 electric customers on our discount rate, a 1.7% increase in enrollment.

***Advertising and Mass Media Campaigns***

This year, NSTAR spent almost \$100,000 in advertising and outreach efforts to promote the discount. The NSTAR companies created a new Discount Rate print advertisement and placed it in 34 publications across the service territory during the months of July and August 2000. The advertisement appeared in the majority of these publications three times, equaling a total of 94 impressions. The media buy for the campaign targeted communities where the largest populations of eligible customers reside. In addition, the print advertisement was placed in Portuguese, Spanish, Chinese and Russian newspapers as well as a publication for senior citizens.



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NSTAR issued a press release about the Discount Rate on August 22, 2000. This resulted in approximately two-dozen stories appearing in weekly community newspapers. Mention of the Discount Rate has also occurred in related news stories.

We have appeared on a local radio talk show, and a community access cable program in Boston, to discuss rates, consumer assistance and energy efficiency programs.

Finally, our website, [nstaronline.com](http://nstaronline.com), includes information for customers and agencies regarding the discount rate.

### ***Customer Mailings, Brochures and Inserts***

Based on feedback we received from customers, we redesigned our customer insert about the discount rate to make it easier to read. Each NSTAR electric customer received a Discount Rate bill insert in July, August or September 2000. A message about the Discount Rate also appeared for each company at least two times either through bill messages or inclusion in customer newsletters or other inserts. Each customer also received a separate bill insert, explaining all of our available rates.

Inserts include a toll free number for customers who have questions about the rate.

The annual Financial Hardship form, which was inserted in December bills, also communicated Discount Rate information.

### ***Call Center Assistance***

We believe the most convenient way for customers to enroll in any of our programs is through our toll-free call center. We held additional training for our call center and billing employees, to make sure they understood all of the programs a customer could use to participate in the rate. More than 200 people attended this training. Customers can call us for information about the rate, and we will initiate eligibility verification for them based on that phone call. We also train our staff to educate customers about different rates and energy efficiency programs whenever customers call with questions about their bills, or if they have difficulty paying their bill.

If a customer, applying for service, receives benefits administered by the Low Income Home Energy Assistance Program (LIHEAP) or the Department of Transitional Assistance ("DTA"), including Supplemental Security Income, we can initiate their enrollment based on that phone call. Also, customers can mail copies of benefit statements or benefit cards, such as the Senior Pharmacy program card, to enroll. If an existing customer becomes a new DTA client, we have a partnership with an independent mailing firm that automatically sends the customer information about the discount. This allows us to reach new DTA clients without intruding on their privacy. When the customer returns that form to us, we will automatically process the application.

Our Commonwealth Electric subsidiary has a partnership with the Salvation Army, to offer applications to the working poor, and to people who do not participate in government sponsored public-benefit programs.

### ***Automatic Enrollment and Renewals Through Various Government Agencies***



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The most common method for our customers to apply for the discount rate is through a matching program we have with DTA, Mass Health and the LIHEAP agencies serving our customers. These computer matches allow us to automatically qualify or renew this discount for more than 93% of our customers who receive the discount rate. We are working with state officials to establish consistent, statewide data matching protocols that will simplify program administration efforts for all customers, agencies, and utilities, and, we hope, increase the number of customers who receive benefits.

### ***Outreach Through Public Offices in our Service Area***

In addition to the outreach provided through DTA and the 10 Fuel Assistance agencies serving our area, NSTAR Electric also visited more than 100 town offices and other public buildings, to discuss our services and leave copies of our discount rate brochures.

We also continued a long-standing tradition of meeting with representatives of major social service agencies to discuss new qualifications for the discount rate, and other programs we offer for all customers. These include: the Boston Housing Authority, the Cape Cod Times Needy Fund, the Lower Cape Outreach Council, The City of Boston's Elder Affairs office, Councils on Aging and Senior centers in several towns, Morgan Memorial/Goodwill, the South Shore Community Action Council, the Salvation Army, Coastline Elderly Services of New Bedford, People Acting in Community Endeavors of New Bedford, the United Way, the Urban League and the Saint Vincent DePaul Society.

A complete list of those agencies will be forwarded to you next week, along with copies of our discount rate brochure.

Thank you for the opportunity to provide the above information. If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in cursive script that reads "Margaret A. Coughlan".

Margaret A. Coughlan, Manager

Regulatory Relations

Telephone (617) 424-3738

email: [margaret\\_coughlan@nstaronline.com](mailto:margaret_coughlan@nstaronline.com)



800 Boylston Street Boston, Massachusetts 02199

**Attachment  
DTE-1-7 (d)**

December 20, 2001

Ms. Karen Pisiewski  
Public Information Officer  
70 Franklin Street, 7<sup>th</sup> Floor  
Boston, MA 02110

**RE: Low Income Discount Electric Rate**

Dear Ms. Pisiewski:

NSTAR Electric is please to provide the following information about the results of our outreach efforts through December 2001.

NSTAR performed comprehensive outreach efforts for our discounted, residential assistance rates. We took more of a hands-on approach this year delivering to key community leaders across our service territory answering questions that might arise.

Our efforts consisted of:

- Advertising campaigns;
- Brochures and bill inserts;
- Education and assistance through our call centers;
- Outreach through public offices, community organizations, etc. throughout our service territory;
- Automatic enrollment and renewals through various government agencies, Head Start organizations, schools across our territory, WIC, Women Infant and Children's Organization.

Specific details of these programs are described below. Overall, we are proud of our efforts to reach the needy in our community. In January 2001, we had 49,632 customers on the discount rate, as of November 30, 2001 we have 52,398 customers on the discount rate; a 5.57% increase from enrollment.

**Advertising**

This year, NSTAR spent over \$100,000 in advertising and outreach efforts to promote the discount rate. The NSTAR companies created a Discount print advertisement and placed it in 30 publications across the service territory during the months of July and August 2001. The media buy for the campaign targeted communities where the largest populations of eligible customers reside. In addition, the print advertisement was placed in Portuguese, Spanish, and Chinese newspapers as well as a publication for senior citizens. This year we also incorporated discount rate advertising as part of our overall corporate print ad campaign.





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Discount Rate Letter  
December 20, 2001  
Page 2

NSTAR's donation of a total of \$250,000 to area community action programs resulted in about two dozen news items across the NSTAR territory including dailies in Boston, Worcester, New Bedford and the Cape and several local weeklies. Donations were made to PACE in New Bedford, ABCD in Boston, the South Shore Community Action Council, the South Middlesex Opportunity Council, the Worcester Community Action Program and the Cape Cod Needy Fund. NSTAR has also received significant media coverage for cutting the Cost of Gas three times and lowering both the Default Service and Standard Offer Service price of electricity.

Finally, our website, [nstaronline.com](http://nstaronline.com), includes information for customers and agencies regarding the discount rate.

#### **Customer Mailings, Brochures and Inserts**

Based on feedback we received from customers, we redesigned our customer insert about the discount rate to make it easier to read. Each NSTAR customer received a discount rate bill insert in July, August or September 2001. A message about the Discount Rate also appeared for each company at least two times either through bill messages or inclusion in customer newsletter or other inserts. Each customer also received a separate bill insert, explaining all of our available rates. A total of four bill inserts mentioned the discount rate availability.

Inserts include a toll free number for customers who have questions about the rate.

The annual Financial Hardship form, which was inserted in December bills, also communicated the Discount Rate information.

#### **Call Center Assistance**

We believe the most convenient way for customers to enroll in any of our programs is through our toll free call center. We had additional training for our call center and billing employees to make sure they understood all the programs a customer could use to participate in the rate. Customers can call us for information about the rate, and we will initiate eligibility verification for them based on that phone call. We also train our staff to educate customers about different rates and energy-efficiency programs whenever customers call with questions about their bills, or if they have difficulty paying their bills.

If a customer, applying for service, receives benefits administered by the Low-Income Home Energy Assistance Program (LIHEAP) or the Department of Transitional Assistance (DTA) including Supplemental Security Income, we can initiate their enrollment based on that phone call. Also, customers can mail copies of benefit statements or benefit cards to enroll. If an existing customer becomes a new DTA client, we have a partnership with an independent mailing firm that automatically sends the customer discount rate information. This allows us to reach new DTA clients without intruding on their privacy. When the customer returns that form to us, we will automatically process the application.



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### **Outreach Through Community Leaders in Our Service Area**

In addition to the outreach provided through DTA and the 10 Fuel Assistance agencies serving our area, NSTAR also visited more than 100 town offices throughout our service territory i.e. Selectmen's office, Town Clerk's, Town Halls; to discuss our service and leave copies of our discount rate brochures.

We also continue a long standing tradition of meeting with key community leaders to discuss new qualifications for the discount rate, and other programs we offer for all customers. These include:

- Community organizations such as the Urban League, South Boston Neighborhood House, etc.
- Delivered to fire and police departments through our territory;
- Delivered to eight Health and Human Services organizations. Codman Square for instance was extremely excited and asked for 500 brochures;
- Spoke at Westport Senior Center and South Boston Neighborhood House as requested. Had a booth at Mayor Menino's Health Walk in October this year and Seniors Count at Boston Public Library.
- Added food banks, Roxbury District Court, Cambridge City Hospital and housing organizations;
- Visited eight veteran's agents.
- Delivered print ad and/or brochures to 35 libraries across our service territory.
- Additionally we delivered information to Department of Revenue.

Complete list of those agencies are attached.

### **Automatic Enrollment and Renewals Through Various Government Agencies**

The most common method for our customers to apply for the discount rate is through a matching program we have with DTA, Mass Health and the LIHEAP agencies serving our customers. These computer matches allow us to automatically qualify or renew this discount for more than 93% of our customers who receive the discount rate. We are working with state officials to establish consistent, statewide data matching protocols that will simplify program administration efforts for all customers, agencies and utilities, and we hope to increase the number of customers who receive benefits.



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Our Commonwealth Electric Subsidiary has a partnership with the Salvation Army to offer applications to the working poor, and to people who do not participate in government sponsored public benefit programs.

New this year is a program where we targeted 150 random schools across the service territory. We developed an authorization form where schools verify eligibility based on the school lunch program. One school requested a letter and form in Spanish.

We also targeted Head Starts developing an authorization form where they can automatically verify eligibility.

We are now entering the final stages of an agreement with WIC to have them verify 175% poverty level for their clients.

Thank you for the opportunity to provide the above information. If you have any questions, please do not hesitate to contact me.

Sincerely,

Kathleen R. Orrick  
Regulatory Relations  
Telephone (617) 424-2176  
Email: Kathleen\_Orrick@nstaronline.com



800 Boylston Street Boston, Massachusetts 02199

**Attachment  
DTE-1-7 (e)**

December 31, 2002

Ms. Karen Pisiewski  
Public Information Officer  
70 Franklin Street, 7<sup>th</sup> Floor  
Boston, MA 02110

**RE: Low Income Discount Electric Rate**

Dear Ms. Pisiewski:

NSTAR Electric is please to provide the following information about the results of our outreach efforts through December 2002.

NSTAR performed comprehensive outreach efforts for our discounted, residential assistance rates. We took a hands-on approach this year delivering to key community leaders across our service territory answering questions that might arise.

Our efforts consisted of:

- Advertising campaigns;
- Brochures and bill inserts;
- Education and assistance through our call centers;
- Outreach through public offices, community organizations, etc. throughout our service territory;
- Automatic enrollment and renewals through various government agencies, Head Start organizations, schools across our territory, WIC, Women Infant and Children's Organization.
- Pilot program with Chelsea School Department;
- Point of Purchase display at Department of Revenue;
- Outreach to Refugees and Immigrants

Specific details of these programs are described below. Overall, we are proud of our efforts to reach the needy in our community. In November of 2001 we had 52,398 customers on the discount rate; as of November 30, 2002 we have 56,282 customers on the discount rate. That is an increase of 7.4%. That increase is on top of the increase we made in last year's efforts of 5.57%.

**Advertising**

This year, NSTAR spent over \$80,000 in advertising and outreach efforts to promote the discount rate. The NSTAR companies created a Discount print advertisement and placed it in 10 publications across the service territory during the first quarter of 2002. The media buy for the campaign targeted communities where the largest populations of eligible customers reside.



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NSTAR continues to promote in the media the importance of energy efficiency and the availability of NSTAR's energy efficiency programs. These efforts resulted in coverage in several media stories including a feature article in the national publication *Chartwell's Residential Energy Management and Energy Efficiency Report*, two *Boston Globe* articles, a *New Bedford Standard Times* article, a *Boston Business Journal* article about commercial energy efficiency programs and articles in local weekly papers about energy efficiency savings by cities and towns served by NSTAR.

NSTAR's website, [nstaronline.com](http://nstaronline.com), lists detailed information about our current energy efficiency programs and includes links to related websites.

#### **Customer Mailings, Brochures and Inserts**

Each NSTAR customer received a discount rate bill insert in the first quarter of 2002. A message about the Discount Rate also appeared for each company at least two times either through bill messages or inclusion in customer newsletter or other inserts. Each customer also received a separate bill insert, explaining all of our available rates. A total of four bill inserts mentioned the discount rate availability.

Inserts include a toll free number for customers who have questions about the rate.

The annual Financial Hardship form, which was inserted in November bills, also communicated the Discount Rate information.

#### **Call Center Assistance**

We believe the most convenient way for customers to enroll in any of our programs is through our toll free call center. We had additional training for our call center and billing employees to make sure they understood all the programs a customer could use to participate in the rate. Customers can call us for information about the rate, and we will initiate eligibility verification for them based on that phone call. We also train our staff to educate customers about different rates and energy-efficiency programs whenever customers call with questions about their bills, or if they have difficulty paying their bills.

If a customer, applying for service, receives benefits administered by the Low-Income Home Energy Assistance Program (LIHEAP) or the Department of Transitional Assistance (DTA) including Supplemental Security Income, we can initiate their enrollment based on that phone call. Also, customers can mail copies of benefit statements or benefit cards to enroll. If an existing customer becomes a new DTA client, we have a partnership with an independent mailing firm that automatically sends the customer discount rate information. This allows us to reach new DTA clients without intruding on their privacy. When the customer returns that form to us, we will automatically process the application.



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Discount Rate Letter  
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### **Outreach Through Community Leaders in Our Service Area**

In addition to the outreach provided through DTA and the 10 Fuel Assistance agencies serving our area, NSTAR also visited more than 100 town offices throughout our service territory i.e. Selectmen's office, Town Clerk's, Town Halls; to discuss our service and leave copies of our discount rate brochures.

We also continue a long-standing tradition of meeting with key community leaders to discuss new qualifications for the discount rate, and other programs we offer for all customers. These Include:

- Community organizations such as the Urban League, South Boston Neighborhood House, etc.
- Delivered to fire and police departments through our territory;
- Delivered to Health and Human Services organizations.
- Spoke at South Boston Neighborhood House as requested. Had a booth at Mayor Menino's Health Walk in October this year and Seniors Count at Boston Public Library.
- Spent afternoon at Orchard Park Housing. Spoke to clients about discount rate and general questions they had on their bills.
- Speaking engagement with Keystone Apartments resulting in Housing Authority automatically verifying income on the spot enabling seniors to immediately get on discount rate without trouble of filling out cards.
- Speaking engagement with Millis Seniors regarding discount rate.
- Attended meeting with World Fair and Housing Coalition on December 18<sup>th</sup> at Community Action Agency of Somerville advising about outreach for our discount rate also answering questions regarding protections for elderly and customers.
- Speaking engagement at Rochester Council on Aging
- Delivered brochures to food banks, Roxbury District Court, Cambridge City Hospital and housing organizations such as Mission Main, Roxbury.
- Distributed discount brochures to seniors at the City of Boston Winter Preparedness Press Conference. Distributed to veteran's agents across service territories
- Delivered print ad and/or brochures to over 30 libraries across our service territory.
- Set up point of purchase display at Department of Revenue.
- Distributed discount brochure and explanation to all Senators and Representatives throughout Massachusetts.



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- Delivered brochures to office of Refugees and Immigrants.

Complete list of those agencies are attached.

### **Automatic Enrollment and Renewals Through Various Government Agencies**

The most common method for our customers to apply for the discount rate is through a matching program we have with DTA, Mass Health and the LIHEAP agencies serving our customers. These computer matches allow us to automatically qualify or renew this discount for more than 93% of our customers who receive the discount rate. We are working with state officials to establish consistent, statewide data matching protocols that will simplify program administration efforts for all customers, agencies and utilities, and we hope to increase the number of customers who receive benefits.

Our Commonwealth Electric Subsidiary has a partnership with the Salvation Army to offer applications to the working poor, and to people who do not participate in government sponsored public benefit programs.

We expanded our school program this year to reach approximately 200 schools across the service territory. We developed an authorization form where schools verify eligibility based on the school lunch program. We expanded this program by developing an authorization form in Spanish, Portuguese, Vietnamese and Serbo-Croatian. We worked closely with Chelsea Public Schools resulting in approximately 1,100 in new applications.

We finalized an automatic eligibility form for Head Starts where they can automatically verify eligibility.

We have continuing to work with an agreement entered into with WIC to have them verify 175% poverty level for their clients.

Thank you for the opportunity to provide the above information. If you have any questions, please do not hesitate to contact me.

Sincerely,

Kathleen R. Orrick  
Regulatory Relations  
Telephone (617) 424-2176  
Email: Kathleen\_Orrick@nstaronline.com



800 Boylston Street Boston, Massachusetts 02199

**Attachment  
DTE-1-7 (f)**

December 31, 2003

Ms. Karen Pisiewski  
Public Information Officer  
70 Franklin Street, 7<sup>th</sup> Floor  
Boston, MA 02110

**RE: Low Income Discount Electric Rate**

Dear Ms. Pisiewski:

NSTAR Electric is please to provide the following information about the results of our outreach efforts through December 2003.

NSTAR performed comprehensive outreach efforts for our discounted, residential assistance rates. We took a hands-on approach this year delivering to key community leaders across our service territory answering questions that might arise.

Our efforts consisted of:

- Advertising campaigns;
- Brochures and bill inserts;
- Education and assistance through our call centers;
- Outreach through public offices, community organizations, etc. throughout our service territory;
- Automatic enrollment and renewals through various government agencies, Head Start organizations, schools across our territory, WIC, Women Infant and Children's Organization.
- Point of Purchase display at Department of Revenue;
- Outreach to Refugees and Immigrants
- Energy Bucks Program

Specific details of these programs are described below. Overall, we are proud of our efforts to reach the needy in our community. In November of 2002 we had 56,282 customers on the discount rate; as of November 30, 2003 we have 57880 customers on the discount rate. That is an increase of \_\_\_\_%.

**Advertising**

This year, NSTAR spent over \$80,000 in advertising and outreach efforts to promote the discount rate. The NSTAR companies created a Discount print advertisement and placed it in 22 publications across the service territory during the first quarter of 2003. The media buy for the campaign targeted communities where the largest populations of eligible customers reside.





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The Energy Bucks campaign, which is aimed at promoting fuel assistance, utility discount rates, and energy efficiency programs, officially kicked off in November. The following highlights some of the events and media coverage to date: A press release was held at PACE on November 3rd with representatives from PACE, NSTAR, State Representative Barney Frank, and New Bedford Mayor Frederick Kalisz to create awareness of Energy Bucks. The Standard Times, WBS Radio, and Channel 8 covered the event. NSTAR participated in a half hour cable show called PACE Monthly in New Bedford on November 6th to promote Energy Bucks and the services available to qualifying customers.

A press event was held at an ABCD fuel assistance intake sight on Mission Hill to launch the Energy Bucks campaign. Speakers included representatives from NSTAR, Mass Electric, ABCD, Councilman Mike Ross, and a fuel assistance recipient. Local radio and television were in attendance to cover the event. In addition, Neighborhood Network News ran a segment on their Boston cable channel covering the event, as well as an in-studio interview with an NSTAR representative about Energy Bucks. Over 100 calls were received on the Energy Bucks line the first week of the campaign. Solomon McCown, the public relations firm we have contracted with, continues to seek media opportunities in an effort to promote this campaign.

NSTAR's website, [nstaronline.com](http://nstaronline.com), lists detailed information about our current energy efficiency programs and includes links to related websites.

### **Customer Mailings, Brochures and Inserts**

Each NSTAR customer received a discount rate bill insert in the first quarter of 2003. Discount Rate information also appeared in the "Important Notice for Residential Customers" (financial hardship) bill insert sent to all customers. A bill insert detailing all of our available rates, including Discount Rates, was also received. A total of three bill inserts mentioned the availability of the Discount Rate this year.

Inserts include a toll free number for customers who have questions about the rate.

### **Call Center Assistance**

We believe the most convenient way for customers to enroll in any of our programs is through our toll free call center. We had additional training for our call center and billing employees to make sure they understood all the programs a customer could use to participate in the rate. Customers can call us for information about the rate, and we will initiate eligibility verification for them based on that phone call. We also train our staff to educate customers about different rates and energy-efficiency programs whenever customers call with questions about their bills, or if they have difficulty paying their bills. Additional training was set up for our Energy Bucks Program.

If a customer, applying for service, receives benefits administered by the Low-Income Home Energy Assistance Program (LIHEAP) or the Department of Transitional Assistance (DTA) including Supplemental Security Income, we can initiate their enrollment based on that phone call. Also, customers can mail copies of benefit statements or benefit cards to enroll. If an existing customer becomes a new DTA client, we have a partnership with an independent mailing firm that automatically sends the customer discount rate information. This allows us to reach new DTA clients without intruding on their privacy. When the customer returns that form to us, we will automatically process the application.



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### **Outreach Through Community Leaders in Our Service Area**

In addition to the outreach provided through DTA and the Fuel Assistance agencies serving our area, NSTAR also visited more than 100 town offices throughout our service territory i.e. Selectmen's office, Town Clerk's, Town Halls; to discuss our service and leave copies of our discount rate brochures.

We also continue a long-standing tradition of meeting with key community leaders to discuss new qualifications for the discount rate, and other programs we offer for all customers. These Include:

- Community organizations such as the Urban League, South Boston Neighborhood House, etc.
- Delivered to fire and police departments through our territory;
- Delivered to Health and Human Services organizations.
- Had a booth at Mayor Menino's Health Walk in October this year.
- Delivered brochures to food banks, Roxbury District Court, Cambridge City Hospital and housing organizations such as Mission Main, Roxbury.
- Recertification program at Orchard Park Housing providing automatic renewal of discount rate.
- Recertification program at Keystone Apartments providing automatic renewal of discount rate.
- Distributed to veteran's agents across service territories
- Delivered print ad and/or brochures to over 30 libraries across our service territory.
- Set up point of purchase display at Department of Revenue.
- Distributed discount brochure and explanation to all Senators and Representatives throughout Massachusetts.
- Delivered brochures to office of Refugees and Immigrants.

Complete list of those agencies are attached.



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### **Automatic Enrollment and Renewals Through Various Government Agencies**

The most common method for our customers to apply for the discount rate is through a matching program we have with DTA, Mass Health and the LIHEAP agencies serving our customers. These computer matches allow us to automatically qualify or renew this discount for more than 93% of our customers who receive the discount rate. We are working with state officials to establish consistent, statewide data matching protocols that will simplify program administration efforts for all customers, agencies and utilities, and we hope to increase the number of customers who receive benefits.

Our Commonwealth Electric Subsidiary has a partnership with the Salvation Army to offer applications to the working poor, and to people who do not participate in government sponsored public benefit programs. The Good Neighbor Energy Fund had the following interviews: WJAR-10, Providence; WOMR-FM, Cape Cod; WQRC-FM, Cape Cod, WDIS-AM, Norfolk; WBSM-AM, New Bedford; and WATD-FM, South Shore.

Our school program proved again this year to be an extremely successful way to reach parents of students who receive free lunch. We developed an authorization form where schools verify eligibility based on the school lunch program. We expanded this program by developing an authorization form in Spanish, Portuguese, Vietnamese and Serbo-Croatian. We have also developed an automatic eligibility form for Head Starts and WIC – Women Infant Children.

Thank you for the opportunity to provide the above information. If you have any questions, please do not hesitate to contact me.

Sincerely,

Kathleen R. Orrick  
Regulatory Relations  
Telephone (617) 424-2176  
Email: Kathleen\_Orrick@nstaronline.com



One NSTAR Way  
Westwood, Massachusetts 02090

**Attachment  
DTE-1-7 (g)**

December 30, 2004

Ms. Karen Pisiewski  
Public Information Officer  
70 Franklin Street, 7<sup>th</sup> Floor  
Boston, MA 02110

**RE: Low Income Discount Electric Rate**

Dear Ms. Pisiewski:

NSTAR Electric is please to provide the following information about the results of our outreach efforts through December 2004.

As of November 30, 2004 approximately 51,170 NSTAR customers are enrolled for this rate. Once customers are enrolled in government qualifying programs such as Head Start, WIC, School Lunch programs, customers are automatically enrolled on our discount rate.

In addition NSTAR takes several other steps to ensure awareness of this rate.

- Bill inserts
- Community Advertising
- Community Partnerships
  - Department of Transitional Assistance (DTA)
  - Fuel Assistance agencies
  - Mass Health
  - Urban League
  - Housing Authorities
  - Veterans Agencies
  - South Boston Neighborhood House
  - Fire and police station distribution
  - Roxbury District Court
  - Mission Main, Orchard Park Housing, Keystone Apartments
  - Food banks
  - Libraries
  - Mayor's Health Walk
  - Department of Revenue
  - Office of Refugees and Immigrants
- Community posters in libraries and town halls
- Web Site ([www.nstaronline.com](http://www.nstaronline.com))
- Media Outreach
- New customer solicitation through NSTAR's call center



One NSTAR Way  
Westwood, Massachusetts 02090

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#### Energy Efficiency Program/Energy Bucks

As part of a broad portfolio of energy efficiency programs, customers on our Discount Rate can receive a free home energy consultation, which may include the installation of conservation measures such as lighting, insulation and refrigerator replacement.

Energy Bucks is an integrated campaign combining grassroots outreach, community based activities and advertising to build awareness of the variety of services available to families on limited income. This program is to assist income eligible customers with energy costs. Low income customers may be eligible for energy efficient measures such as lighting, refrigeration, and insulation measures at no cost.

The outreach targets a mix of fourteen large metropolitan areas and towns where there is a lower rate of participation among qualified customers: Boston, Brockton, Cambridge, Fitchburg, Greenfield, Haverhill, Lowell, Lynn, New Bedford, Pittsfield, Quincy, Somerville, Springfield, and Worcester. Together, the utilities have agreed to a campaign budget of \$921,000 for 2005/2006 split proportionately in a formula agreed to by the utilities and LEAN.

#### Good Neighbor Energy Fund

Each year NSTAR includes a Salvation Army Good Neighbor Energy donation envelope with its bills. In addition, NSTAR contributes \$75,000 to this fund, and also communicates this fund as an option for customers experiencing difficulty in paying their bill. To date this year, NSTAR and its customers have contributed well over \$200,000 to this fund.

#### Forgiveness Program (LASER)

NSTAR partners with the Massachusetts Department of Housing and Community Development and the Action for Boston Community Development, Inc. to assist them with a federally funded program known as the "Forgiveness Program." The primary objective of the LASER project is to help families achieve financial independence. Services to the family can include instruction of day-to-day money management and ways to make good energy decisions. An important component of the program includes \$200.00 incentive from NSTAR for candidates who commit to and maintain a payment plan for their past due balances with NSTAR. ABCD executes and communicates this program in the Boston area.

#### Payment Options

To help our customers manage their bills, NSTAR offers a myriad of options. These include walk-in payment centers, direct payment/pay by phone, electronic bill payment with Checkfree.com, payment plans for customers in arrears, budget billing, and credit card payments. These options are frequently communicated via bill inserts, bill statement messaging and arrears letters.

#### Advertising

This year, NSTAR spent over \$85,000 in advertising and outreach efforts to promote the discount rate. The NSTAR companies created a Discount print advertisement and placed it in 22 publications across the service territory during the first quarter of 2004. The media buy for the campaign targeted communities where the largest populations of eligible customers reside.



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#### Customer Mailings, Brochures and Inserts

Each NSTAR customer received a discount rate bill insert in the first quarter of 2004. Discount Rate information also appeared in the "Important Notice for Residential Customers" (financial hardship) bill insert sent to all customers. A bill insert detailing all of our available rates, including Discount Rates, was also received. A total of three bill inserts mentioned the availability of the Discount Rate this year.

Inserts include a toll free number for customers who have questions about the rate.

#### Call Center Assistance

We believe the most convenient way for customers to enroll in any of our programs is through our toll free call center. We had additional training for our call center and billing employees to make sure they understood all the programs a customer could use to participate in the rate. Customers can call us for information about the rate, and we will initiate eligibility verification for them based on that phone call. We also train our staff to educate customers about different rates and energy-efficiency programs whenever customers call with questions about their bills, or if they have difficulty paying their bills. Additional training was set up for our Energy Bucks Program.

#### Outreach Through Community Leaders in Our Service Area

In addition to the outreach provided through DTA and the Fuel Assistance agencies serving our area, NSTAR also visited more than 100 town offices throughout our service territory i.e. Selectmen's office, Town Clerk's, Town Halls; to discuss our service and leave copies of our discount rate brochures.

We also continue a long-standing tradition of meeting with key community leaders to discuss new qualifications for the discount rate, and other programs we offer for all customers. These Include:

- Community organizations such as the Urban League, South Boston Neighborhood House, etc.
- Recertification program at Orchard Park Housing providing automatic renewal of discount rate.
- Distributed to veteran's agents across service territories
- Set up point of purchase display at Department of Revenue.
- Distributed discount brochure and explanation to all Senators and Representatives throughout Massachusetts.
- Delivered brochures to office of Refugees and Immigrants.
- Speaking engagement at Coastline Elderly Services in New Bedford.
- Ongoing project involving Maverick Gardens in East Boston enabling new tenants who meet discount rate guidelines automatic eligibility.
- Booth at the Natick Council on Aging community day.

Complete list of those agencies are attached.

#### Automatic Enrollment and Renewals Through Various Government Agencies

NSTAR Electric is in the process of implementing a comprehensive computer matching program with the Executive Office of Health and Human Services in order to more efficiently identify customers who are eligible



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for NSTAR Electric's discount rates. NSTAR Electric's past efforts to identify eligible customers through computer matching programs with the DTE, Mass Health and LIHEAP have allowed the company to automatically qualify or renew this discount for more than 93% of our customers who receive the discount rate. The new computer matching program includes consistent, statewide data matching protocols that will simplify program administration efforts for all customers, agencies and utilities, which will likely increase the number of customers who receive benefits.

#### School Lunch Program

Our school program proved again this year to be an extremely successful way to reach parents of students who receive free lunch. We developed an authorization form where schools verify eligibility based on the school lunch program. We expanded this program by developing an authorization form in Spanish, Portuguese, Vietnamese and Serbo-Croatian. We have also developed an automatic eligibility form for Head Starts and WIC – Women Infant Children.

Thank you for the opportunity to provide the above information. If you have any questions, please do not hesitate to contact me.

Sincerely,

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